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December 29, 2009

Ms. Theresa Stiner
Planning, Permitting, and Engineering Section
Iowa Department of Natural Resources
Wallace Building, 502 East 9th Street
Des Moines, Iowa 50219-0034

Subject: End of Life Vehicle Solutions Corporation Annual Manufacturers' Implementation Report

Dear Ms. Stiner,

Iowa Administrative Code 567-Chapter 215, "Mercury-Added Switch Recovery from End-of-Life Vehicles", requires vehicle manufacturers to annually report:

- (1) the number of mercury-added switches collected
- (2) an estimate of the amount of mercury contained in the collected switches
- (3) the capture rate
- (4) the estimated number of vehicles manufactured containing mercury added switches; and
- (5) the estimated number of vehicles that have been processed for recycling

This report is provided by End of Life Vehicle Solutions Corporation on behalf of its member automotive companies. The participating members of ELVS are: Chrysler Group LLC; Daimler EAPP Americas; Ford Motor Company; Motors Liquidation Company (formerly General Motors Corporation); Mack Trucks Inc; Mitsubishi Motors North America, Inc; Navistar, Inc.; Nissan North America, Inc; PACCAR, Inc; Porsche Cars North America Inc.; Subaru of America, Inc; Toyota Motor Sales USA, Inc.; Volkswagen Group of America, Inc; and Volvo Trucks North America.

For the period December 16, 2008 through December 15, 2009 a total of 16,696 mercury switches were delivered to the ELVS recycling contractor from Iowa dismantlers, yielding 36.7 pounds of recovered mercury. There are 398 registered dismantlers in Iowa, 75 of which have submitted switches during this period.

The estimated number of switches available for recovery in Iowa during 2009 was 66,000, resulting in an annual capture rate through December 15, 2009 of 25.3%.

ELVS uses the National Vehicle Mercury Switch Recovery Program (NVMSRP) Switch Retirement Model (www.elvsolutions.org/model.html) approved by the U.S. EPA and program partners to estimate mercury switch populations. The model was developed to identify switch populations and estimate mercury switch retirement rates through 2017. Therefore the model focuses on mercury switch counts rather than vehicle counts. The model reports that the estimated national total number of mercury switches historically manufactured in vehicles to be 169,185,000. Most of the vehicles containing these switches have already been scrapped, with an estimated 22,008,000 switches remaining in today's national fleet for collection through 2017. Iowa's portion of these switches remaining for collection through 2017 is estimated at 375,000. The number of mercury switches that were available nationally for recovery in 2009 is estimated to be 3,734,000 units. In Iowa, 66,000 switches were available for recovery in 2009.

Earlier this year, the Model was updated. Version 1 of the model made an adjustment for exports based on older (non-current) export data. A new, current source of export data has since been found and has been incorporated into the new Version 2 of the model. Additionally, Version 1 did not allow adjustments for economic recessions when the vehicle retirement rate decreases. Version 2 allows for such adjustments.

The model will be reviewed annually and incorporate the most recent export data as well as data regarding the size of the recession adjustment. If the economy is in a recession, then the total switches available for collection will be adjusted down by 9.4% unless additional data indicate this adjustment should change. If there is no recession, no downward 'recession adjustment' will be made to the data.

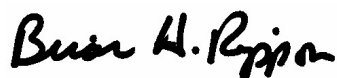
(The information presented here is available through the ELVS website, www.elvsolutions.org with linkage to our contractor's website, <http://www.eqonline.com/services/ELVS-Mercury-Switch-Recovery-Program/annual-report.asp?year=all>. Information is updated daily as additional switches are delivered to our contractor, and is available for downloading into Excel for your convenience. This web-based data tracking system is part of ELVS' commitment to data accessibility, and will be available until 2017.)

Over the last year, participation and mercury switch submittals have risen. Most recently, the National Highway Transportation Safety Administration's *Car Allowance Rebate System* ("Cash for Clunkers") program increased the number of recycling companies participating in the switch program. The availability of additional scrapped vehicles from the Cash for Clunkers program may result in an increase in recovered switches even though the economic recession has slowed the overall scrappage rate of vehicles nationwide. (Active membership in the ELVS program was mandatory for recyclers to be included in the Cash for Clunkers program.)

NVMSRP constantly assesses the overall progress of mercury switch recovery programs in order to identify what additional actions may be needed to encourage further recycler participation and to improve switch capture rates. We look forward to an increase in the number of switches returned to ELVS for recycling in 2010.

If you have any questions or comments regarding this report, please contact me at brelvs@yahoo.com or 248-477-7357.

Sincerely,

A handwritten signature in black ink that reads "Brian H. Rippon". The signature is written in a cursive, flowing style.

Brian Rippon
End of Life Vehicle Solutions
Project Manager